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Attorneys for Plaintiff
COREPHOTONICS, LTD.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

COREPHOTONICS, LTD.

Plaintiff,

vs.

APPLE INC.

Defendant.

Case No. 3:17-cv-06457-JD (Lead)
Case No. 5:18-cv-02555-JD

**DECLARATION OF JAMES S. TSUEI IN
SUPPORT OF PLAINTIFF
COREPHOTONICS, LTD.'S
SUPPLEMENTAL BRIEF REGARDING
CLAIM CONSTRUCTION**

1 I, James S. Tsuei, state as follows:

2 1. I am a member of the State Bar of California and an attorney at the firm of Russ,
3 August & Kabat, counsel for Plaintiff Corephotonics, Ltd. in the above captioned action. I have
4 personal knowledge of the facts set forth herein, and if called upon to testify, could and would
5 testify competently thereto.

6 2. I submit this declaration in support of Corephotonics' Supplemental Brief
7 Regarding Claim Construction.

8 3. Attached as Exhibit 1 is a true and correct copy of an excerpt from IEEE
9 Authoritative Dictionary of IEEE Standards Terms (7th edition, 2000), including definitions for
10 the word "controller."

11 4. Attached as Exhibit 2 is a true and correct copy of Nicholas R. Waltham, Ian G.
12 van Breda, and Graham M. Newton "Simple transputer-based CCD camera controller", Proc. SPIE
13 1235, Instrumentation in Astronomy VII, (1 July 1990).

14 5. Attached as Exhibit 3 is a true and correct copy of U.S. Patent Application
15 Publication 2018/0184005.

16 6. Attached as Exhibit 4 is a true and correct copy of U.S. Patent Application
17 Publication 2021/0318798.

18 7. Attached as Exhibit 5 is a true and correct copy of U.S. Patent 8,565,709.

19 8. Attached as Exhibit 6 is a true and correct copy of U.S. Patent 10,218,907.

20 9. Attached as Exhibit 7 is a true and correct copy of U.S. Patent Application
21 Publication 2020/0120261.

22 10. Attached as Exhibit 8 is a true and correct copy of the Reexamination Certificate
23 for U.S. Patent 9,185,219, dated June 30, 2023.

24 I declare under penalty of perjury under the laws of the United States the foregoing is true
25 and correct.

Executed on July 10, 2022 in Los Angeles, California.

By: /s/ James S. Tsuei
James S. Tsuei

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